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August 31, 2021

BY ECF

Hon. Sarah L. Cave
United States Magistrate Judge
United States District Court for the Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Rachel Bell v. JPMorgan Chase Bank, N.A., and Jones Lang LaSalle Americas, Inc.*
Case no. 20-cv-02468(PGG)(slc)

Dear Judge Cave,

This firm represents Plaintiff in the action referenced above. This letter is respectfully submitted to seek an extension of time to respond to Defendant JP Morgan Chase's letter of August 27, 2021 (Dkt. 50) and a commensurate continuance of the conference scheduled for September 10 at 12:00 noon.

Defendant's letter was filed at 3:04 PM on Friday, when I was not in the office. I did not see the ECF notice until yesterday. My associate assigned to the case, Andrew Padover, Esq., due to an oversight, had not filed a notice of appearance, so he did not receive the notice. And my calendar clerk who receives copies of my ECF notices, Ms. Strong, is on vacation. Additionally, although the letter indicates at the bottom that it was being emailed to me and Mr. Padover, neither of us received such an email from defense counsel. I wish to note, though, that defense counsel Lindsay Kalick, Esq. has acknowledged and apologized for this omission.

Due to the press of other matters, including a deposition today that I am in the middle of as I am writing this, and a brief due in the D.C. Circuit tomorrow, I find that additional time is required to properly respond to Defendant's letter.

Plaintiff respectfully requests that the deadline for responding to the letter be moved to Friday September 10, and that the conference be continued to a later date at the court's convenience.

Defense counsel Ms. Kalick has consented to this application.

Plaintiff thanks the Court for its courtesies in this matter.

Plaintiff's request at ECF No. 54 is GRANTED. Plaintiff shall file her response to Defendant JPMorgan Chase Bank N.A.'s letter-motion (ECF No. 49) by **September 10, 2021**. The telephone conference currently scheduled for September 10, 2021 is ADJOURNED to **Wednesday, September 15, 2021 at 2:00 pm**. The parties are directed to call: (866) 390-1828; access code: 380-9799, at the scheduled time.

The Clerk of Court is respectfully directed to close ECF No. 54.

SO ORDERED 9/1/2021


SARAH L. CAVE
United States Magistrate Judge